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January 11, 2021

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VIA ECF

Judge Stuart M. Bernstein United States District Court, Southern District of New York One Bowling Green New York, NY 10004

Re: SIPC v. Bernard L. Madoff Investment Securities, LLC. (Adv. Pro. No. 08-01789)

and Fairfield Sentry Limited (In Liquidation) v. Theodoor GGC Amsterdam, et al.

(Adv. Pro. No. 10-03496)

Dear Judge Bernstein:

Cleary Gottlieb Steen & Hamilton LLP ("CGSH") is counsel to various defendants, set forth in Exhibit A (together with their affiliates and subsidiaries, the "CGSH Clients"), in connection with the above referenced cases (the "Madoff matters").

I write to provide notice to the Court and to the applicable parties that one of your former law clerks, Kristin Corbett, has been hired by CGSH as an associate in our New York office. From September 2019 to December 2020, Ms. Corbett clerked in your Chambers. We understand that during her clerkship, Ms. Corbett assisted with several opinions related to SIPC v. Bernard L. Madoff Investment Securities, LLC. (Adv. Pro. No. 08-01789) and Fairfield Sentry Limited (In Liquidation) v. Theodoor GGC Amsterdam, et al. (Adv. Pro. No. 10-03496), as well as various other related adversary proceedings, and participated in discussions in Chambers concerning these cases (Ms. Corbett's "Prior Work").

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Judge Stuart M. Bernstein, p. 2

In accordance with Rule 1.12 of the New York Rules of Professional Conduct ("Rule 1.12"), we are screening Ms. Corbett from any participation in any of the Madoff matters (collectively, the "Screened Matters") to ensure that there is no flow of information about the Screened matters between Ms. Corbett and the CGSH team working on the Screened Matters. All CGSH attorneys working on the Screened Matters have been instructed that they should not communicate with Ms. Corbett about their work on the Screened Matters or share any confidential information from the Screened Matters with Ms. Corbett. Similarly, Ms. Corbett has been instructed that she is not to work on the Screened Matters or communicate with the CGSH attorneys working on the Screened Matters about such matters.

Finally, as an associate, none of Ms. Corbett's compensation will be apportioned from or related to fees from the Screened Matters.

Respectfully submitted,

Nowell D. Bamberger, a Partner

Skall D. Beenbyn

Cc: Counsel of Record, via ECF

Exhibit A

Trustee BNP Paribas Defendants

	Case No.	Case Name	Defendant Name
1.	Adv. Pro. No. 10- 05286	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Legacy Capital Ltd. et al.	BNP Paribas Securities Corp.
2.	Adv. Pro. No. 10- 04457	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Equity Trading Portfolio Ltd. et al.	BNP Paribas Arbitrage SNC
3.	Adv. Pro. No. 11- 02796	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas Arbitrage SNC	BNP Paribas Arbitrage SNC
4.	Adv. Pro. No. 12- 01576	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas S.A. et al.	BNP Paribas S.A.
5.	Adv. Pro. No. 12- 01576	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas S.A. et al.	BNP Paribas (Suisse) S.A.
6.	Adv. Pro. No. 12- 01576	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas S.A. et al.	BNP Paribas Arbitrage
7.	Adv. Pro. No. 12- 01576	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas S.A. et al.	BNP Paribas Bank & Trust (Canada)
8.	Adv. Pro. No. 12- 01576	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas S.A. et al.	BNP Paribas Bank & Trust Cayman Ltd.
9.	Adv. Pro. No. 12- 01576	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas S.A. et al.	BGL BNP Paribas Luxembourg S.A.
10.	Adv. Pro. No. 12- 01576	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas S.A. et al.	BNP Paribas Securities Services Succursale de Luxembourg

	Case No.	Case Name	Defendant Name
11.	Adv. Pro. No. 12- 01576	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas S.A. et al.	BNP Paribas Securities Services S.A

Trustee Citi Defendants

	Case No.	Case Name	Defendant Name
1	Adv. Pro. No. 09- 05345	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Citibank, N.A., et al.	Citibank, N.A.; Citicorp North America, Inc.; Citigroup Global Markets Limited
2.	Adv. Pro. No. 12- 01700	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Caprice Int'l Grp., Inc., et al.	Citibank (Switzerland) AG

Trustee Credit Agricole Defendants

	Case No.	Case Name	Defendant Name
1.	Adv. Pro. 12-01022	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Crédit Agricole (Suisse) SA, et al	Crédit Agricole (Suisse) SA
2.	Adv. Pro. 12-01022	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Crédit Agricole (Suisse) SA, et al.	Crédit Agricole S.A.
3.	Adv. Pro. 12-01670	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Crédit Agricole Corporate and Investment Bank	Crédit Agricole Corporate and Investment Bank

Trustee HSBC Defendants

	Case No.	Case Name	Defendant Name
1	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Bank plc
2.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Holdings plc
3.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Securities Services (Luxembourg) S.A.
4.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Fund Services (Luxembourg) S.A.
5.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Securities Services (Ireland) Designated Activity Company (sued as HSBC Securities Services (Ireland) Limited)
6.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Securities Services (Bermuda) Limited
7.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC France, Dublin Branch (sued as HSBC Institutional Trust Services (Ireland) Limited, which changed its name to HSBC Institutional Trust Services (Ireland) Designated Activity Company and subsequently merged with HSBC France)
8.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Institutional Trust Services (Bermuda) Limited

	Case No.	Case Name	Defendant Name
9.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Bank USA, N.A.
10.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Cayman Services Limited (sued as HSBC Bank (Cayman) Limited)
11.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Private Banking Holdings (Suisse) S.A
12.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Private Bank (Suisse) S.A.
13.	Adv. Pro. No. 09- 01364	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Alpha Prime Fund Limited et al.	HSBC Bank Bermuda Limited
14.	Adv. Pro. No. 11- 02784	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Somers Dublin Limited et al.	Somers Dublin Designated Activity Company (f/k/a Somers Dublin Limited)
15.	Adv. Pro. No. 11- 02784	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Somers Dublin Limited et al.	Somers Dublin Limited
16.	Adv. Pro. No. 11- 02784	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Somers Dublin Limited et al.	Somers Nominees (Far East) Limited
17.	Adv. Pro. No. 12- 01005	Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. SICO Limited	SICO Limited

Fairfield BBH Defendants

	Case No.	Case Name	Defendant Name
1	Adv. Pro. 10-03752	Fairfield Sentry Ltd. (In Liquidation), et al. v. Brown Brothers Harriman & Co., et al.	Blush & Co.
2.	Adv. Pro. 10-03752	Fairfield Sentry Ltd. (In Liquidation), et al. v. Brown Brothers Harriman & Co., et al.	Brown Brothers Harriman & Co.
3.	Adv. Pro. 10-03752	Fairfield Sentry Ltd. (In Liquidation), et al. v. Brown Brothers Harriman & Co., et al.	Fox & Co.

Fairfield BNP Paribas Defendants

	Case No.	Case Name	Defendant Name
1	Adv. Pro. 10-03635	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	BNP Paribas (Suisse) SA
2.	Adv. Pro. 10-03635	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	BNP Paribas (Suisse) SA Ex Fortis (n/k/a BNP Paribas (Suisse) SA)
3.	Adv. Pro. 10-03635	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	BNP Paribas (Suisse) SA Private (n/k/a BNP Paribas (Suisse) SA)
4.	Adv. Pro. 10-03636	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	BNP Paribas (Suisse) SA
5.	Adv. Pro. 10-03636	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	BNP Paribas (Suisse) SA Ex Fortis (n/k/a BNP Paribas (Suisse) SA)
6.	Adv. Pro. 10-03636	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	BNP Paribas (Suisse) SA Private (n/k/a BNP Paribas (Suisse) SA)
7.	Adv. Pro. 10-04098	Fairfield Sentry Ltd. (In Liquidation), et al. v. BNP Paribas Arbitrage SNC, et al.	BNP Paribas Arbitrage SNC
8.	Adv. Pro. 10-04099	Fairfield Sentry Ltd. (In Liquidation), et al. v. BNP Paribas Private Bank and Trust Cayman Ltd., et al.	BNP Paribas Private Bank and Trust Cayman Ltd
9.	Adv. Pro. 11-01579	Fairfield Sentry Ltd. (In Liquidation), et al. v. BNP Paribas Securities Nominees Ltd., et al.	BNP Paribas Securities Nominees Ltd.

	Case No.	Case Name	Defendant Name
10.	Adv. Pro. 11-01617	Fairfield Sentry Ltd. (In Liquidation), et al. v. Fortis Bank SA/NV, et al.	BNP Paribas Fortis
11.	Adv. Pro. 12-01551	Fairfield Sentry Ltd. (In Liquidation), et al. v. BNP Paribas España f/k/a Fortis Bank (España), et al.	BNP Paribas España
12.	Adv. Pro. No. 11- 01242	Fairfield Sentry Ltd. v. BGL BNP Paribas S.A., et al.	BGL BNP Paribas S.A. (f/k/a FS/Fortis Banque Luxembourg)
13.	Adv. Pro. No. 11- 01242	Fairfield Sentry Ltd. v. BGL BNP Paribas S.A., et al.	Banque Generale du Luxembourg (n/k/a BGL BNP Paribas S.A.)
14.	Adv. Pro. No. 10- 03627	Fairfield Sentry Ltd. v. BNP Paribas Securities Services Luxembourg, et al.	BNP Securities Services Luxembourg S.A.
15.	Adv. Pro. No. 10- 03626	Fairfield Sentry Ltd. v. BNP Paribas Luxembourg SA a/k/a BGL BNP Paribas, et al.	BNP Paribas Luxembourg (a/k/a BGL BNP Paribas S.A.)

Fairfield BNY Defendants

	Case No.	Case Name	Defendant Name
	1 Adv. Pro. 11-01589	Fairfield Sentry Ltd. (In Liquidation), et al. v. BNY AIS Nominees Ltd., et al.	BNY AIS Nominees, Ltd.
2.	Adv. Pro. 11-01604	Fairfield Sentry Ltd. (In Liquidation), et al. v. PFPC Bank Limited, et al.	BNY Mellon International Bank Ltd. f/k/a PFPC International Bank Ltd., PNC International Bank Limited and PFPC Bank Ltd

Fairfield Citi Defendants

	Case No.	Case Name	Defendant Name
1.	Adv. Pro. 10-03622	Fairfield Sentry Ltd. (In Liquidation), et al. v. Citibank NA London, et al.	Citibank NA London
2.	Adv. Pro. 10-03624	Fairfield Sentry Ltd. (In Liquidation), et al. v. Zurich Capital Markets Company, et al.	Citibank (Switzerland) Zurich;¹ Citivic Nominees Limited
3.	Adv. Pro. 10-03640	Fairfield Sentry Ltd. (In Liquidation), et al. v. Citibank (Switzerland) AG, et al.	Citibank (Switzerland) AG
4.	Adv. Pro. 10-04100	Fairfield Sentry Ltd. (In Liquidation), et al. v. Citivic Nominees Limited, et al.	Citivic Nominees Limited
5.	Adv. Pro. 11-02770	Fairfield Sentry Ltd. (In Liquidation), et al. v. Citigroup Global Markets Limited, et al.	Citigroup Global Markets Limited
6.	Adv. Pro. 12-01298	Fairfield Sentry Ltd. (In Liquidation), et al. v. Don Chimango SA, et al.	Cititrust (Bahamas) Limited

Fairfield Credit Agricole Defendants

	Case No.	Case Name	Defendant Name
1.	Adv. Pro. 10-03624	Fairfield Sentry Ltd. (In Liquidation), et al. v. Caceis Bank Luxembourg, et al.	Caceis Bank Luxembourg
2.	Adv. Pro. 10-03635	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	Caceis Bank Luxembourg
3.	Adv. Pro. 10-03636	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	Caceis Bank Luxembourg
4.	Adv. Pro. 10-03752	Fairfield Sentry Ltd. (In Liquidation), et al. v. Brown Brothers Harriman & Co., et al.	Credit Agricole (Miami)
5.	Adv. Pro. 10-03752	Fairfield Sentry Ltd. (In Liquidation), et al. v. Brown Brothers Harriman & Co., et al.	Credit Lyonnais Miami n/k/a Credit Lyonnais S.A. Miami

¹ The party sued here as "Citibank (Switzerland) Zurich" is a nonexistent entity, and there is no concession to the contrary by submitting this filing.

	Case No.	Case Name	Defendant Name
6.	Adv. Pro. 10-03752	Fairfield Sentry Ltd. (In Liquidation), et al. v. Brown Brothers Harriman & Co., et al.	Credit Lyonnais n/k/a LCL-LE Credit Lyonnais S.A.
7.	Adv. Pro. 10-03754	Fairfield Sentry Ltd. (In Liquidation), et al. v. CDC IXIS, et al.	CDC IXIS
8.	Adv. Pro. 10-03871	Fairfield Sentry Ltd. (In Liquidation), et al. v. Caceis Bank EX-IXIS IS, et al.	Caceis Bank Ex Ixis Is
9.	Adv. Pro. 11-01244	Fairfield Sentry Ltd. (In Liquidation), et al. v. CA Indosuez (Switzerland) SA, et al.	CA Indosuez (Switzerland) S.A.
10.	Adv. Pro. 11-02787	Fairfield Sentry Ltd. (In Liquidation), et al. v. Credit Agricole Titres, et al.	CPR Online
11.	Adv. Pro. 11-02787	Fairfield Sentry Ltd. (In Liquidation), et al. v. Credit Agricole Titres, et al.	Credit Agricole Titres
12.	Adv. Pro 12-01288	Fairfield Sentry Ltd. (In Liquidation), et al. v. CAIS Bank, et al.	CAIS Bank
13.	Adv. Pro 12-01288	Fairfield Sentry Ltd. (In Liquidation), et al. v. CAIS Bank, et al.	Calyon Paris

Fairfield HSBC Defendants

	Case No.	Case Name	Defendant Name
1.	Adv. Pro. 10-03619	Fairfield Sentry Ltd. (In Liquidation), et al. v. HSBC Institutional Trust Services (Asia) Limited, et al.	HSBC Institutional Trust Services (Asia) Limited.
2.	Adv. Pro. 10-03628	Fairfield Sentry Ltd. (In Liquidation), et al. v. Robinson & Co., et al.	Murdoch & Co.
3.	Adv. Pro. 10-03628	Fairfield Sentry Ltd. (In Liquidation), et al. v. Robinson & Co., et al.	Robinson &. Co.
4.	Adv. Pro. 10-03629	Fairfield Sentry Ltd. (In Liquidation), et al. v. FS/HSBC Private Banking Nom, et al.	HSBC Private Banking Nom a/k/a HSBC Private Banking Nominee 1 (Jersey) Ltd. n/k/a Republic Nominees Limited

	Case No.	Case Name	Defendant Name
5.	Adv. Pro. 10-03630	Fairfield Sentry Ltd. (In Liquidation), et al. v. HSBC Securities Services (Luxembourg) SA, et al.	HSBC Securities Services (Luxembourg), SA
6.	Adv. Pro. 10-03631	Fairfield Sentry Ltd. (In Liquidation), et al. v. HSBC Private Bank (Guernsey) Ltd., et al.	HSBC Private Bank (C.I.) Limited
7.	Adv. Pro. 10-03631	Fairfield Sentry Ltd. (In Liquidation), et al. v. HSBC Private Bank (Guernsey) Ltd., et al.	HSBC Private Bank (Guernsey) Ltd. a/k/a HSBC Republic Bank (Guernsey) Ltd. n/k/a HSBC Private Bank (C.I.) Limited
8.	Adv. Pro. 10-03631	Fairfield Sentry Ltd. (In Liquidation), et al. v. HSBC Private Bank (Guernsey) Ltd., et al.	Republic Nominees Limited
9.	Adv. Pro. 10-03633	Fairfield Sentry Ltd. (In Liquidation), et al. v. HSBC Private Bank Suisse SA, et al.	HSBC Private Bank Suisse SA
10.	Adv. Pro. 10-03634	Fairfield Sentry Ltd. (In Liquidation), et al. v. Zurich Capital Markets Company, et al.	HSBC Bank USA
11.	Adv. Pro. 10-03635	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	"HSBC" ²
12.	Adv. Pro. 10-03636	Fairfield Sentry Ltd. (In Liquidation), et al. v. ABN AMRO Schweiz AG, et al.	"HSBC" ³
13.	Adv. Pro. 10-04097	Fairfield Sentry Ltd. (In Liquidation), et al. v. Banco Nominees (IOM) Limited, et al.	Banco Nominees (IOM) Limited (n/k/a Banco Nominees (Guernsey) Limited)
14.	Adv. Pro. 11-01594	Fairfield Sentry Ltd. (In Liquidation), et al. v. FS/HSBC Guyerzeller Zurich, et al.	HSBC Guyerzeller Zurich a/k/a Guyerzeller Trust Company AG n/k/a HSBC Trust Company AG
15.	Adv. Pro. 12-01270	Fairfield Sentry Ltd. (In Liquidation), et al. v. HSBC Securities (Panama) SA, et al.	HSBC Securities (Panama) SA f/k/a Banistmo Securities, Inc.

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The party sued here as "HSBC" is a nonexistent entity, and there is no concession to the contrary by submitting this filing.

The party sued here as "HSBC" is a nonexistent entity, and there is no concession to the contrary by submitting this filing.

	Case No.	Case Name	Defendant Name
16.	Adv. Pro. 12-01290	Fairfield Sentry Ltd. (In Liquidation), et al. v. HSBC International Trustee Limited, et al.	HSBC International Trustee Limited
17.	Adv. Pro. 12-01556	Fairfield Sentry Ltd. (In Liquidation), et al. v. Somers Nominees (Far East) Limited List Parties, et al.	HSBC Bank Bermuda Limited f/k/a The Bank of Bermuda Limited
18.	Adv. Pro. 12-01556	Fairfield Sentry Ltd. (In Liquidation), et al. v. Somers Nominees (Far East) Limited List Parties, et al.	Somers Nominees (Far East) Limited